

ESTTA Tracking number: **ESTTA632488**

Filing date: **10/13/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059308
Party	Defendant Vaughn Michael Lowery
Correspondence Address	VAUGHN MICHAEL LOWERY 5714 CORBETT STREET LOS ANGELES, CA 90016 UNITED STATES vaughn@the360mag.com
Submission	Answer
Filer's Name	Linda Joy Kattwinkel
Filer's e-mail	ljk@owe.com, jrhodes@owe.com, tmparalegal3@owe.com
Signature	/Linda Joy Kattwinkel/
Date	10/13/2014
Attachments	LOWERY-answer-signed.pdf(152819 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the re matter of Trademark Registration

Petitioner: Steelcase, Inc.
Registration No.: 4270722
Registered: January 8, 2013
Mark: 360 (Stylized)

Steelcase, Inc.

Petitioner,

v.

Vaughn Michael Lowery

Respondent.

Cancellation No. 92059308

**ANSWER TO PETITION FOR
CANCELLATION**

Respondent Vaughn Michael Lowery dba 360 ("Respondent") hereby submits his
Answer in the above-referenced action as follows:

1. Respondent does not have sufficient information to admit or deny the allegations in paragraph 1, and on that basis DENIES such allegations.
2. ADMITTED.
3. Respondent ADMITS that the first use date set forth in Respondent's Registration No. 4270722 is November 1, 2009.
4. Respondent ADMITS that, according to USPTO records, Petitioner filed Application Serial No. 86/161,334 on January 9, 2014. Respondent does not have sufficient

information to admit or deny the remaining allegations in paragraph 4, and on that basis DENIES such remaining allegations.

5. Respondent does not have sufficient information to admit or deny the allegations in paragraph 5, and on that basis DENIES such allegations.

6. Respondent ADMITS that, according to USPTO records, an office action was issued on March 12, 2014 against Petitioner's Application. To the extent Petitioner's description of that office action alleged in paragraph 6 does not accurately reflect the content of the office action, Respondent DENIES such remaining allegations.

7. Respondent does not have sufficient information to admit or deny the allegations in paragraph 7, and on that basis DENIES such allegations.

8. Respondent DENIES that Petitioner will be damaged by the continued registration of Respondent's mark 360. Respondent does not have sufficient information to admit or deny the remaining allegations in paragraph 8, and on that basis DENIES such allegations.

OWEN, WICKERSHAM & ERICKSON, P.C.

Dated: October 13, 2014

By:



Linda Joy Kattwinkel

Attorneys for Respondent
Vaughn Michael Lowery

455 Market Street, 19th Floor
San Francisco, California 94105
(415) 882-3200

CERTIFICATE OF SERVICE

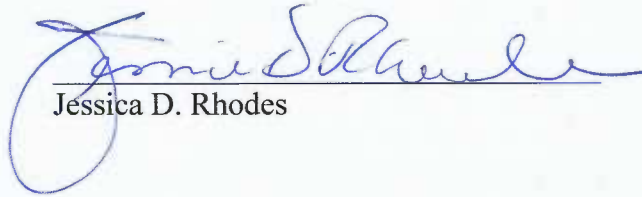
I hereby certify that a true and complete copy of the foregoing

ANSWER TO PETITION FOR CANCELLATION

has been served on Petitioner via First Class Mail to the following address:

Tsan Abrahamson
Cobalt LLP
918 Parker Street, Bldg. A21
Berkeley, CA 94710

Dated: October 13, 2014


Jessica D. Rhodes